

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Mental Health Institute-Independence (31058000)
May 15-17, 2017

Program Year: 2017
Month of Review: May
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming	V-0300	The SFA's application states that there are 3 points of service all of which are at the end of the line. The application also states that students sign their names after they have received their reimbursable meal and that offer versus serve is available to all students. Upon observation, there is one point of service, the count is not generated at the point of service as required and meal service is serve only as opposed to offer versus serve. This is a repeat finding from the previous review. Technical assistance provided.	Describe how the count will be taken at the point of service as students are eating. Modify the application to reflect the SFAs meal service and submit for approval.	
800 - Civil Rights	V-0800	The SFA is required to have a compliant procedure. The SFA's procedure must indicate the following: the person receiving the allegation must transcribe the complaint; procedures for receiving a complaint cannot prevent a complaint from being accepted; outside agencies forwarded complaints must be identified; procedures must not indicate that there was an attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. There is no complaint procedure available. A sample complaint form and a document describing compliant procedure requirements provided.	Submit a copy of the compliant procedure for Food and Nutrition Services civil rights complaints.	
800 - Civil Rights	V-0800	RCCIs are required to collect and maintain the racial and ethnic data on all students who are being claimed. Once data is collected at admission, the RCCI must complete	No further action required.	

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		the racial ethnic form and update monthly. Technical assistance provided. The racial ethnic form was completed while SA was on-site. No further action required.		
1200 - Professional Standards	V-1200	The staff who work in the school nutrition program over 20 hours per week are required to receive at least 6 hours of training per year. Currently the staff working in school nutrition over 20 hours per week have only received 4.5 hours of training. Staff working less than 20 hours per week in the school nutrition program are required to receive 4 hours of training per year. This would include the authorized representative, who has not received any training this year, including civil rights training. SFAs are also required to utilize a tracking tool to ensure that all staff with school nutrition program responsibilities receive their training requirements. Technical assistance, training opportunities and a tracking tool provided.	Submit the tracking tool that lists the names of all school nutrition program staff. Describe how the staff who work more than 20 hours per week in school nutrition will receive the remaining 1.5 hours of training. Submit a copy of the documentation showing that the authorized representative received civil rights training and describe how she will get the 4 total hours in the next school year.	
1400 - Food Safety	V-1400	The HACCP Plan contains some of the required elements but does not contain all required standard operating procedures (SOPs) for the flow of food within the SFA's food service operation. Some SOPs are available but not organized in one location/binder. Technical assistance provided on the required elements. Additional details and sample SOPs can be found here: http://www.extension.iastate.edu/foodsafety/content/haccp-school-foodservice	Submit a table of contents for the updated HACCP plan and 1 SOP that will be included in the HACCP plan.	
Resource Mgt Comprehensive Review	V-RMCRF	The 2015-2016 financial report states that non-program food generated revenue but the non-program food cost documented was \$0.01. Non-program food costs must be included to accurately show that the non-program food revenue, as a percentage of total food revenue, is equal to or greater than the non-program food costs, as a percentage of total food costs. Technical assistance provided.	Determine the cost of non-program foods served in 2015-2016 and revise the 15-16 financial report.	

Site - Level Findings: Cromwell Childrens Unit (8601)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal	V-0400	The food production records were missing some of the	The FSD was not able to	

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Components and Quantities - Lunch		<p>serving size information, some serving sizes were documented as a range instead of the exact serving provided, and recipes were not standardized. There was no CN label for the fish fillet so SA was not able to know how much meat and/or grain the fish credited for. There was not a CN label for the fish fillet in the previous review. Without the specified information provided, documentation shows that the menu requirements during the review period were not met for the daily fruit (2 days), daily vegetable (1 day), weekly red/orange vegetable subgroup and daily grain requirements for 1 day. Food production records must contain exact serving sizes and must contain all menu items including condiments served to show that all daily and weekly meal pattern requirements and nutrition specifications have been met. Technical assistance provided on food production record requirements and supporting document requirements.</p>	<p>obtain a CN label or product formulation statement for the fish and decided to find a different fish fillet that had a CN label. The FSD submitted a copy of the new fish product's CN label. No further action submitted for that finding.</p> <p>Submit one weeks worth of revised lunch food production records to show that all serving sizes and menu items are included and daily and weekly meal pattern requirements are being met.</p>	
1700 - Afterschool Snack	V-1700	<p>The afterschool snack program must take snack counts at the point of service. Currently the number of student snacks served is not taken at the point of service. The afterschool snack serving sizes do not meet the requirements as fruit/vegetables served must equal 3/4 cup, grains offered must be 1 oz equivalent and meat/meat alternate must be 1 oz equivalent. The cycle menu offered provides the 2 required menu components but is short on the required serving sizes for 3 days within the cycle menu (yogurt, cereal and fruit were short). The afterschool monitoring form has not been completed for this school year. Technical assistance provided on the menu requirements, site monitoring form and point of service (POS) counts. The POS counting sheet, the meal pattern, and site monitoring form can be found in Download Forms in the IowaCNP.</p>	<p>Submit the point of service counting form that was completed for one week.</p> <p>Submit the afterschool snack food production record for one week to show that the serving size requirements have been met. Submit a completed afterschool snack monitoring form.</p>	

Org - Level Technical Assistance

Area	Question	Comments
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800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	All program materials must contain the non-discrimination statement. The menus posted did not contain the current non-discrimination statement. The most current statement can be found at the following site: https://www.educateiowa.gov/pk-12/nutrition-programs#Federal_Civil_Rights_Statement If there is not room for the entire statement the abbreviated statement can be used. Technical assistance required.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	The Local Wellness Policy Final Rule states that the assessment of the implementation of the wellness policy goals must also be made available to the public. The assessment is not made available to the public and does not clearly state what is being done to ensure that each of the required goals within the policy are being met. Technical assistance on the wellness policy final rule requirements as well as a folder of wellness resources including an assessment form was provided to the food service director who agrees to make the assessment available to the public by hanging it on the public bulletin board next to the wellness policy.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	RCCIs are encouraged to inform residents and resident's families about the availability and location of free meals for students via the Summer Food Service Program. RCCIs can include this information in their discharge materials. Promotional materials are available at https://www.educateiowa.gov/pk-12/nutrition-programs-0#Promotional_Resources
Resource Mgt Comprehensive Review	4 Were breakfasts and lunches served to teachers, administrators, custodians and other adults priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the lunch?	Foods sold to staff and visitors must be charged at a price that covers the cost of that food. The required adult lunch price for the 2017-2018 school year (07/01/17 - 06/30/18) is \$3.54. If staff or visitors purchase a lunch meal the amount charged must be equal to or greater than the above amount. Technical assistance provided.

Iowa Department of Education
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State Review Summary Report
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May 15-17, 2017

Area	Question	Comments
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	The SFA has an exemption to serve all of their students the 9-12th grade portion size and serve only menu components. Therefore, all students are required to have 1 cup of fruit on their tray at lunch. Per the food buying guide 1 whole pear provides 1/2 cup of fruit and does not meet the serving size requirements. Technical assistance provided.

Org - Level Commendations

Description
BENEFIT ISSUANCE: • Applications were on file for all residential students enrolled in April 2017 to show that they were eligible to receive free meals. Applications contained complete information and all students were determined correctly.
CIVIL RIGHTS: • The “And Justice for All” poster is in a visible public location. • Documentation was available to show that all food service staff received civil rights training. • Medical statements for students with special dietary needs were on file and signed by the institute’s physician. - No discrimination was observed while SA was on site.
FOOD SAFETY: • Food was stored properly and food storage areas were clean and organized. • Food safety inspections showed no findings and were posted in a public location. • Staff demonstrated good food safety practices during the observed meal service. • Temperature logs were available to show food temperatures before, during and after service, for all cooling equipment and dishwashers. Documentation was available to show that thermometers were regularly calibrated.
MEAL COUNTING AND CLAIMING:• The edit check information matches the numbers submitted on the claim. • All student meals served, counted and claimed for the observed breakfast and lunch contained all of the required components. The number of students claimed per day during the review period did not surpass the number of students enrolled.
MEAL PATTERN REQUIREMENTS: • Daily, dated menus and food production records are available for all meals claimed during the review period. • The food service director works with the dietitian and the unit staff to meet the special dietary needs as ordered by the physician on staff. • Three different and approved types of milk are available for students to choose. • The breakfast food production records, menus, labels and recipes available for the week of review indicate that all of the meal pattern serving size requirements have been met for all menu components. • All breakfast menu items are whole grain rich. • Menu certification worksheets have been completed. • All menu components were provided on the lunch food production records and menu during the review period and the weekly requirements were met for meat/meat alternate, grain, milk, and the dark green, starchy, bean/legume, and other vegetable subgroups. • Signage is available on-site to describe the menu options. • Free, potable water is available along with cups.
PROCUREMENT: The SFA participates in DAS's procurement plan and has bid documents available for their primary vendor, bread and milk bids. The SFA has a code of conduct that contains all of the required elements and has checks and balances in place to ensure that all items ordered are received

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State Review Summary Report
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and charged the agreed upon amount.

PROFESSIONAL STANDARDS: • The food service director has met the required number of training hours (12 hours). • Documentation was on file to show all trainings that were received for all food service staff. • The food service director is ServSafe certified.

REPORTING AND RECORD KEEPING: • All school nutrition program documents are kept for at least the required 3 years plus the current year.

RESOURCE MANAGEMENT: • The SFA has their own financial account which contains less than 3 months of operating costs. • The SFA uses their USDA Commodity dollars efficiently. • The SFA's revenue goes directly into their line item account.

SCHOOL WELLNESS POLICY: • The local wellness policy contains all of the required elements and is made available to the public. • The wellness committee consists of a variety of stakeholders. • The policy is updated at least once every three years. • No competitive foods are available for students to purchase during the school day.